

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

| | |
|---|--|
| ----- X | |
| In re | : Chapter 11 Case No. |
| | : |
| LEHMAN BROTHERS HOLDINGS INC., et al., | : 08-13555 (JMP) |
| | : |
| Debtors. | : (Jointly Administered) |
| ----- X | |

**NOTICE OF HEARING TO CONSIDER APPROVAL OF DISCLOSURE
STATEMENT WITH RESPECT TO THE JOINT CHAPTER 11 PLAN FOR
LEHMAN BROTHERS HOLDINGS INC. AND ITS AFFILIATED DEBTORS
OTHER THAN MERIT, LLC, LB SOMERSET LLC AND LB PREFERRED
SOMERSET LLC PROPOSED BY NON-CONSOLIDATION PLAN PROPONENTS**

NAME OF DEBTORS AND CASE NUMBERS

| | |
|--|-----------------|
| Lehman Brothers Holdings Inc. | 08 -13555 (JMP) |
| Lehman Commercial Paper Inc. | 08 -13900 (JMP) |
| Lehman Brothers Commodities Services Inc. | 08 -13885 (JMP) |
| Lehman Brothers Special Financing Inc. | 08 -13888 (JMP) |
| Lehman Brothers OTC Derivatives Inc. | 08 -13893 (JMP) |
| Lehman Brothers Commercial Corporation | 08 -13901 (JMP) |
| Lehman Brothers Derivatives Products Inc. | 08 -13899 (JMP) |
| Lehman Brothers Financial Products Inc. | 08 -13902 (JMP) |
| LB 745 LLC | 08 -13600 (JMP) |
| PAMI Statler Arms LLC | 08 -13664 (JMP) |
| CES Aviation LLC | 08 -13905 (JMP) |
| CES Aviation V LLC | 08 -13906 (JMP) |
| CES Aviation IX LLC | 08 -13907 (JMP) |
| East Dover Limited | 08 -13908 (JMP) |
| Lehman Scottish Finance L.P. | 08 -13904 (JMP) |
| Luxembourg Residential Properties Loan | 09 -10108 (JMP) |
| BNC Mortgage LLC | 09 -10137 (JMP) |
| LB Rose Ranch LLC | 09 -10560 (JMP) |
| Structured Asset Securities Corporation | 09 -10558 (JMP) |
| LB 2080 Kalakaua Owners LLC | 09 -12516 (JMP) |

PLEASE TAKE NOTICE THAT on April 25, 2011, the Non-Consolidation Plan Proponents (the "Plan Proponents") filed the Joint Chapter 11 Plan for Lehman Brothers Holdings Inc. and Its Affiliated Debtors Other Than Merit, LLC, LB Somerset LLC and LB Preferred Somerset LLC Proposed by Non-Consolidation Plan Proponents [Docket No. 16229] (as may be amended, modified and/or supplemented from time to time, the "Plan") and the Disclosure Statement with respect to the Plan [Docket No. 16230] (as may be amended, modified and/or supplemented from time to time, the "Disclosure Statement"), pursuant to section 1125 of title 11 of the United States Code (the "Bankruptcy Code").

PLEASE TAKE FURTHER NOTICE THAT:

1. A hearing will be held before the Honorable James M. Peck, United States Bankruptcy Judge, in Courtroom 601 of the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court"), One Bowling Green, New York, New York 10014, on **June 28, 2011 at 10:00 a.m. (Eastern Time)** (the "Disclosure Statement Hearing") to consider the entry of an order, among other things, determining that Disclosure Statement contains "adequate information" within the meaning ascribed to such term in section 1125 of the Bankruptcy Code and approving the Disclosure Statement.

2. Any party in interest wishing to obtain a copy of the Disclosure Statement and the Plan may request such copy, in writing, from **Epiq Bankruptcy Solutions, LLC, Attn: Lehman Ballot Processing Center, 757 Third Avenue, 3rd Floor, New York, New York 10017**. Interested parties may also examine the Disclosure Statement and the Plan free of charge at www.lehman-docket.com. In addition, the Disclosure Statement and the Plan are on file with the Bankruptcy Court and may be examined by accessing the Bankruptcy Court's website: www.nysb.uscourts.gov. Note that a PACER password and login are needed to access documents on the Bankruptcy Court's website. A PACER password can be obtained at: www.pacer.psc.uscourts.gov.

3. Objections and responses, if any, to approval of the Disclosure Statement, must (a) be in writing, (b) conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York, and the *Second Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures*, dated June 17, 2010 [Docket No. 9635], (c) set forth the name(s) of the objecting party/(ies), (d) set forth the nature and amount of the claim(s) or equity interest(s) held or asserted by each objecting party/(ies) against the Debtor(s), (e) state with particularity the legal and factual bases relied upon for the objection or response, and (f) be filed, together with proof of service, with the Bankruptcy Court and served **so that they are actually received by the following parties no later than May 27, 2011 at 4:00 p.m. (Eastern Time)**: (i) the **chambers of the Honorable James M. Peck, United States Bankruptcy Judge**, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) **Weil Gotshal & Manges LLP**, 767 Fifth Avenue, New York, New York 10153, Attn: Harvey R. Miller, Esq., Lori R. Fife, Esq., and Alfredo R. Pérez,

Esq., attorneys for the Debtors; (iii) the **Office of the United States Trustee** for Region 2, 33 Whitehall Street, 21st Floor, New York, New York 10004, Attn: Tracy Hope Davis, Esq., Elisabetta Gasparini, Esq. and Andrea Schwartz, Esq.; (iv) **Milbank, Tweed, Hadley & McCloy LLP**, 1 Chase Manhattan Plaza, New York, New York 10005, Attn: Dennis F. Dunne, Esq., Dennis O'Donnell, Esq., and Evan Fleck, Esq., attorneys for the official committee of unsecured creditors; and (v) the respective attorney for each of the **Plan Proponents**, as identified in the Disclosure Statement.

IF AN OBJECTION OR RESPONSE TO APPROVAL OF THE DISCLOSURE STATEMENT IS NOT FILED AND SERVED STRICTLY AS PRESCRIBED HEREIN, THE OBJECTING PARTY MAY BE BARRED FROM OBJECTING TO THE ADEQUACY OF THE DISCLOSURE STATEMENT AND MAY NOT BE HEARD AT THE DISCLOSURE STATEMENT HEARING.

4. Any party in interest that is entitled to vote on the Plan will receive a copy of the Disclosure Statement, the Plan and various documents related thereto, unless otherwise ordered by the Bankruptcy Court.

5. The Disclosure Statement Hearing may be adjourned from time to time. If the Disclosure Statement Hearing is adjourned, the Plan Proponents shall file a notice with the Bankruptcy Court and serve such notice on all parties on the Master Service List.

DATED: April 25, 2011
New York, New York

Attorneys for the Plan
Proponents